

# **EXHIBIT D**

JENNER & BLOCK LLP  
Reid J. Schar (*pro hac vice*)  
RSchar@jenner.com  
353 N. Clark Street  
Chicago, IL 60654-3456  
Telephone: +1 312 222 9350  
Facsimile: +1 312 527 0484

CLARENCE DYER & COHEN LLP  
Kate Dyer (Bar No. 171891)  
kdyer@clarencedyer.com  
899 Ellis Street  
San Francisco, CA 94109-7807  
Telephone: +1 415 749 1800  
Facsimile: +1 415 749 1694

CRAVATH, SWAINE & MOORE LLP  
Kevin J. Orsini (*pro hac vice*)  
korsini@cravath.com  
825 Eighth Avenue  
New York, NY 10019  
Telephone: +1 212 474 1000  
Facsimile: +1 212 474 3700

Attorneys for Defendant PACIFIC GAS AND ELECTRIC  
COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
PACIFIC GAS AND ELECTRIC COMPANY,  
  
Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF** [REDACTED]  
[REDACTED]

Judge: Hon. William Alsup

1 I, [REDACTED] declare as follows:

2 1. I am the Director of Vegetation Management Execution at Pacific Gas and  
3 Electric Company ("PG&E"). In this role, I am responsible for overseeing the execution of all of  
4 PG&E's vegetation management programs. I have held this position since July 2019. While I  
5 was not involved in vegetation management work during the post-Carr Fire restoration effort in  
6 2018 and therefore do not have personal knowledge of the events described below, I understand  
7 the following based on my review of relevant records.

8 2. As part of the post-Carr Fire restoration effort, PG&E contractor  
9 Mountain G Enterprises, Inc. ("Mountain G") maintained a database of information generated  
10 during the post-Carr Fire vegetation management work. The database maintained by  
11 Mountain G is referred to "ArcGIS".

12 3. During the post-Carr Fire restoration effort, vegetation management  
13 personnel, including pre-inspectors and Quality Control ("QC") inspectors, uploaded information  
14 to the ArcGIS database using a smartphone and computer tablet app called "Collector".

15 4. I have reviewed reports from the ArcGIS database used to store data  
16 generated during the post-Carr Fire restoration work, as well as other Mountain G records.  
17 These records, and my own experience with subsequent versions of ArcGIS and Collector,  
18 indicate the following:

- 19 a. The Collector app allowed vegetation management personnel to download  
20 a map of the area which they were assigned to inspect or work each day  
21 and to input data into Collector while they were out in the field.
- 22 b. Pre-inspectors and QC inspectors would identify trees requiring work  
23 through the Collector app, which allows identification of trees for removal  
24 by dropping points on a map, associating trees identified for work with  
25 longitude and latitude points representing the location the inspector was  
26 standing when inputting the point.

1 c. Pre-inspectors would input information about the tree, including any  
2 additional location information, the tree species, and the removal class of  
3 the tree based on its size.

4 d. Vegetation management personnel would upload the data through Collector  
5 when they had completed their work for the day and had reliable cellular  
6 service or WiFi. Uploaded data was stored in Mountain G's ArcGIS  
7 database.

8 e. Mountain G would subsequently assign the work to a tree removal  
9 contractor.

10 5. Mountain G's versions of ArcGIS and the Collector app do not  
11 communicate with any PG&E database systems. Mountain G would send periodic reports by  
12 email to PG&E personnel and other contractors working on the post-Carr Fire work (the "Carr  
13 Fire Daily Reports"). The Carr Fire Daily Reports often contained a summary of the overall  
14 status of the post-Carr Fire work and include spreadsheets with individual tree listings.

15 6. I have reviewed certain emails sent by Mountain G personnel attaching  
16 Carr Fire Daily Reports. These records indicate the recipients typically included: (i) [REDACTED]  
17 [REDACTED] a Vegetation Management Emergency Preparedness and Response Manager with  
18 PG&E; (ii) [REDACTED] a Distribution Field Operations Manager with Mountain G;  
19 (iii) [REDACTED] a Transmission Field Operations Manager with Mountain G; (iv) [REDACTED]  
20 a Director of Vegetation Management with Clear Path Utility Solutions, LLC; and (v) [REDACTED]  
21 [REDACTED], the Chief Operations Officer with Sierra Nevada Consulting, Inc.

22 7. Based on the records I reviewed, other individuals that received at least  
23 one email containing a Carr Fire Daily Report were: (i) [REDACTED] a Senior Vegetation  
24 Management Regional Manager with PG&E; (ii) [REDACTED] a Task Force Lead with Clear  
25 Path Utility Solutions, LLC; (iii) [REDACTED] a Project Manager with Phillips and Jordan,  
26 Inc.; (iv) [REDACTED] a Database Management Specialist with Davey Resource Group, Inc.;  
27 (v) [REDACTED] a Project Manager with Mountain G; (vi) [REDACTED] a GIS Technician  
28

1 with Mountain G; and (vii) [REDACTED] the Chief Executive Officer of MLU Services, Inc.  
2 Selected examples of these Carr Fire Daily Reports and associated cover emails are attached  
3 hereto as Exhibit 1.  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 I declare under the penalty of perjury that the foregoing is true and correct and  
2 that I executed this declaration on March 2, 2021 in San Ramon, California.

3 [REDACTED]  
4 [REDACTED]

5 [REDACTED]  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# **EXHIBIT 1**

# **EXHIBIT 1-A**



To: [REDACTED]  
Cc: [REDACTED]  
From: [REDACTED]  
Sent: Mon 8/6/2018 3:54:08 PM (UTC-07:00)  
Subject: Carr Fire Status Report  
[Report20180806.xlsx](#)

\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\*

Please see attached report

Thanks!

[REDACTED] GIS Database Manager

**MOUNTAIN G. ENTERPRISES, INC.**

[REDACTED]

[REDACTED]



# **EXHIBIT 1-A.1**

Native Excel File  
Provided to the Court on a Hard Drive

# **EXHIBIT 1-B**

To: [REDACTED] Case 3:14-cr-00175-WHA Document 1352-2 Filed 03/19/21 Page 13 of 23

From: [REDACTED]  
Sent: Wed 9/5/2018 12:58:15 PM (UTC-07:00)  
Subject: Carr Fire Daily Report  
[Report20180905.xlsx](#)

\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\*

Please see attached

Thanks!

[REDACTED] GIS Database Manager

**MOUNTAIN G. ENTERPRISES, INC.**  
[REDACTED]

[REDACTED]



# **EXHIBIT 1-B.1**

Native Excel File  
Provided to the Court on a Hard Drive

# **EXHIBIT 1-C**



To: [REDACTED]  
From: [REDACTED]  
Sent: Thur 10/4/2018 10:26:43 AM (UTC-07:00)  
Subject: Carr Fire Daily Report  
[Report20181004.xlsx](#)

\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\*

Please see attached

Thanks!

[REDACTED] | GIS Database Manager

**MOUNTAIN G. ENTERPRISES, INC.**  
[REDACTED]

[REDACTED]



# **EXHIBIT 1-C.1**

Native Excel File  
Provided to the Court on a Hard Drive

# **EXHIBIT 1-D**

To: [REDACTED]  
From: [REDACTED] Case 3:14-cr-00175-WHA Document 1352-2 Filed 03/19/21 Page 21 of 23  
Sent: Wed 11/7/2018 9:25:08 AM (UTC-08:00)  
Subject: Carr Fire Daily Report  
[Report20181107.xlsx](#)

\*\*\*\*\*CAUTION: This email was sent from an EXTERNAL source. Think before clicking links or opening attachments.\*\*\*\*\*

Please see attached

Thanks!

[REDACTED] | GIS Database Manager

**MOUNTAIN G. ENTERPRISES, INC.**

[REDACTED]

[REDACTED]



# **EXHIBIT 1-D.1**

Native Excel File  
Provided to the Court on a Hard Drive